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Attorneys for Defendant
U.S. Bank National Association

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

CLARK McKINLAY

Plaintiff,

vs.

DISCOVER BANK, U.S. BANK, N.A.,
EQUIFAX INFORMATION SERVICES, LLC,
EXPERIAN INFORMATION SOLUTIONS,
INC., TRANS UNION LLC

Defendants.

Case No.: 2:25-cv-00281-GMN-EJY

**JOINT MOTION TO EXTEND
DEADLINE FOR U.S. BANK
NATIONAL ASSOCIATION TO
RESPOND TO PLAINTIFF'S
COMPLAINT (SECOND REQUEST)**

Plaintiff Clark McKinlay, and by through his counsel, LAW OFFICE OF KEVIN L. HERNANDEZ, and Defendant U.S. Bank National Association ("*U.S. Bank*"), by and through its counsel, DUANE MORRIS LLP, jointly request that this Court grant this Joint Motion, in compliance with LR IA 6-1 and LR 7-1(c), for an extension of time for U.S. Bank to respond to Plaintiff's complaint, currently due April 18, 2025, up to and including **May 2, 2025**.

This extension will allow U.S. Bank's counsel to continue analyzing the claims made, obtain and review any relevant documents, and for the parties to evaluate whether an early resolution is possible. This is the second request for an extension to U.S. Bank's deadline to respond to the complaint, and is made in good faith and not for the purpose of delay.

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1 DATED: April 15, 2025

2 **LAW OFFICE OF KEVIN L.**
3 **HERNANDEZ**

DUANE MORRIS LLP

4 By: /s/ Kevin L. Hernandez
Kevin L. Hernandez (SBN 12594)

By: /s/ Tyson E. Hafen
Dominica C. Anderson (SBN 2988)
Tyson E. Hafen (SBN 13139)

5 Attorneys for *Plaintiff*

6 Attorneys for Defendant *U.S. Bank National*
7 *Association*

8 **IT IS SO ORDERED** this 15th day of April, 2025.

9 
10 US Magistrate Judge